Summary of Public Comments

Commercial Backcountry Recreation on Crown Land in British Columbia

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A Summary of the Public Response to the Discussion Paper, "Commercial Backcountry Recreation on Crown Land in British Columbia"

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Highlights

In January 1991 BC Lands initiated a public consultation process to assist in the development of policies for commercial backcountry recreation on Crown land. The discussion paper, "*Commercial Backcountry Recreation on Crown Land in British Columbia*", was the starting point for public involvement. Almost 900 submissions have been received in response to the discussion paper. The intent of this summary is to provide an overview of the comments offered by the general public, industry and interested groups.

The next step in the public consultation process will be a workshop on commercial backcountry recreation planned for November 1991. A range of individuals from the public, government and key groups will be invited to this workshop. The information contained in this "*Summary of Public Comments*" will provide the basis for workshop discussion and subsequent policy development. Results of the workshop will be published and distributed to all individuals and groups on our mailing list.

Public consultation will continue into 1992. A document containing the policy directions arising from the public comments and workshop discussions is expected to be released in January 1992 for further public comment.

The following section summarizes the main points made in the public response to the discussion paper.

Public Comments:

General response to the development of a policy for commercial backcountry recreation

- Many of the individuals and groups that responded to the discussion paper were in favour of the development of policies for commercial backcountry recreation on Crown land, although very few supported the full set of proposals contained in the paper.

General response to commercial backcountry recreation

- The feelings expressed toward the commercial backcountry recreation industry were mixed. Some respondents were strongly supportive of the development of this type of tourism industry in B.C., while others were as strongly against any further development in the backcountry.

Planning, inventory and carrying capacity

- Respondents clearly expressed a need for land use planning. Many stated that a comprehensive land use plan was required prior to the allocation of any commercial backcountry recreation tenures.

- A few people questioned the governments' ability to carry out land use planning and assess carrying capacity.

- A small number stated that the social and/or environmental carrying capacity of the land in their area had already been reached.

Public access

- The vast majority of respondents commented on the importance of protecting public access to Crown land. Many individuals and groups were concerned that the public's use of Crown land could be reduced or eliminated through the granting of commercial backcountry recreation rights. Access to trails was a frequently cited concern.

- Respondents generally felt that public use should take priority over commercial use.

- A few respondents argued for restrictions to public access in order to protect the wilderness.

- Some commercial operators felt that restrictions on public access are necessary to protect business viability.

Aboriginal land issues

- Very few respondents commented on aboriginal land issues, however, most that did stated that land claims should be settled prior to any allocations of Crown land for commercial backcountry recreation.

Competitive process

- Mixed response was received regarding the competitive process as a way of allocating Crown land. A few individuals and groups supported the process of competitive tendering while others argued against such an allocation method.

- Some respondents argued that a competitive process would place the initial applicant at a disadvantage.

- The impact of a competitive process, and the bonus bid in particular, on small backcountry operations was a concern for several respondents.

- Several people were concerned that the desire for financial returns could override social and environmental criteria. Most considered the protection of the environment and public access to be more important than economic benefits.

- Respondents expressed a strong desire for locally owned operations and were against foreign ownership of commercial backcountry recreation rights.

- Some respondents felt that existing operators should be given "grandfather rights" and should not need to undergo a competitive process.

- A few people agreed with separate applications for each activity, but several others opposed such a policy.

- Some individuals felt that the proposed process could be very lengthy and time consuming.

Pricing

- Respondents were generally against the use of a bonus bid.

- The proposal that annual rental would be calculated as a percentage of gross revenues received mixed reviews, with almost equal numbers for and against.

- Some respondents argued against the government sharing in any financial returns resulting from a transfer of land rights. Others argued as strongly that land rights should not be transferable, and that any increase in value should belong to the government and people of B.C.

Nature of rights

- A significant number of respondents felt that Crown land should not be sold for commercial backcountry use. Even leases for intensive use sites were questioned by some individuals.

- Commercial backcountry recreation operators argued that the proposed land rights are not sufficient to encourage investment.

- Some respondents were very concerned over the proposed policy that land rights could be modified without compensation.

- Some people presented examples of activities that do not fit the proposed framework of rights.

Resource management and conflict resolution

- Management plans were generally supported but some respondents felt that annual reviews and/or performance bonds should also be required for all tenures.
- Several respondents stated that impact assessments should be conducted by an independent agency.
- A few individuals expressed concerns regarding the government's ability to manage the resource and resolve conflicts.

Safety

- The issue of safety raised very little interest. Those that commented on this section generally agreed with industry self-regulation.

Public input

- Many respondents commented on public input processes. Some felt that more public input into the development of policies for commercial backcountry recreation is required.
- Several people stated that the evaluation of commercial backcountry recreation proposals requires a local review panel.
- A few respondents argued that some other process is required to allow people from outside the area of the proposed development to comment on these proposals.

Land and resource use

- A number of submissions emphasized the growing competition among backcountry uses. In particular, people mentioned conflicts between the tourism industry and timber harvesting.
- Several respondents expressed a desire for some Crown land to be protected from all uses and preserved as wilderness.

Government process and jurisdiction

- A number of respondents stated that too many initiatives relating to the use of B.C.'s land base are currently taking place.

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Introduction

Background

BC Lands is responsible for allocating and managing public land for a wide variety of uses including agriculture, settlement, commerce, recreational use and conservation. In recent years, the commercial backcountry recreation industry has emerged as a significant user of Crown land. Commercial backcountry recreation refers to recreational activities that are carried out in relatively undisturbed environments on a fee-for-service-basis.

The Ministry of Lands and Parks has had policies in place for a number of years to guide the allocation and management of Crown land for alpine ski developments and heli-skiing. In addition, the Ministry gives tenure to cabins associated with guided hunting and fishing operations. However, a policy has not been developed to guide the use of Crown land by other businesses such as those offering heli-hiking, trail riding or snowmobiling. Many commercial backcountry recreation businesses currently operate on Crown land without tenure. With the growing pressures on our backcountry areas, a comprehensive policy is required to manage the use of Crown land for the commercial backcountry recreation industry as a whole. BC Lands is working toward developing such a policy.

Drafting policy for commercial backcountry recreation on Crown land requires consideration of many complex issues. All current debates relating to land and natural resource management in the province are reflected in this topic. Issues such as the appropriate form of tenure, conflicts between users, aboriginal land claims, land use planning, public participation in decision making, economic trade-offs, and the sustainability of local economies in rural areas all arise in this policy development process.

Process to Date

BC Lands initiated the public consultation process through the release of a public discussion paper, "*Commercial Backcountry Recreation on Crown Land in British Columbia*" in January 1991. This document was the starting point for public discussion on the important issues surrounding the use of Crown land for commercial backcountry recreation.

The paper included discussions on topics such as carrying capacity assessment, resource management, and conflict resolution. It also addressed the areas of public access and aboriginal interests on Crown land. In addition, the paper presented an array of possible land tenure types (from permits to leases) for commercial backcountry recreation use of Crown land. The paper was not intended as final policy and the discussions were deliberately general in nature. Public comments were invited in response to the broad policy directions given in the paper.

The discussion paper was initially distributed to a large number of individuals and groups with an interest in the backcountry, including industry participants, tourism associations, outdoor recreation clubs and environmental groups. In the following months, public interest in the paper grew rapidly and the Ministry's mailing list expanded considerably. Due to this strong interest in the issues surrounding the management of commercial backcountry recreation, the deadline for submissions was extended from April to June 30, 1991. At the same time the Ministry announced its commitment to publish a report containing a summary of the comments received from the public.

In addition to distributing the discussion paper, local public meetings were held by a number of BC Lands' regional offices and presentations were made to several interested groups, including non-profit recreation groups and local governments. As part of the public consultation process, BC Lands has also met individually with a wide range of potentially affected interests.

Purpose and Structure of this Report

A total of 892 submissions in the form of letters, industry briefs, and community petitions were received by BC Lands in response to the discussion paper. The intent of this report is to provide an overview of the public response to the issues and policy proposals contained in the discussion paper. This report is only a summary, and it attempts to present the range of opinions offered by industry, the general public and interested groups. It is descriptive in nature and not an analysis of the content of the discussion paper.

The report attempts to capture both specific reactions to outlined proposals and the more general concerns expressed by respondents. Wherever possible, direct quotes from the submissions have been used to allow the respondents to speak in their own words. BC Lands has received a great number of thoughtful comments and every effort has been made to include as many respondents as possible in this report. Many handwritten submissions were received and we ask that the reader please excuse any errors in our quotes or the spelling of authors' names.

Future Process

BC Lands is currently in the process of organizing a workshop for key stakeholders on commercial backcountry recreation. This would take place in November 1991. A range of individuals will be invited to this workshop, including representatives of key public, industry and government organizations.

The information summarized in this report will be the basis for workshop discussion and subsequent policy development. It is hoped that at this conference consensus can be reached on some of the issues, and that areas of disagreement can be channelled into policy options which will encourage further discussion. A report containing the results of the conference will be published and distributed to all groups and individuals on our mailing list.

It is expected that a draft document containing the policy directions arising from the public review of the discussion paper and the workshop discussions will be released in January 1992 for final public comment. BC Lands' objective is to have a working policy in place in the first half of 1992.

Public Comments

General Response to the Development of a Policy

Many of the individuals and groups that responded to the discussion paper applauded BC Lands' efforts in attempting to develop policies for commercial backcountry recreation on Crown land. These respondents, although often critical of many of the proposed policies, recognized a need for managing the rapidly growing commercial backcountry recreation industry.

> *With the growth of demands for relatively pristine areas by a rapidly expanding tourist industry and "adventure travel", I strongly support your efforts to develop plans for the future use of Crown lands for recreational purposes. (Ronald Bradford, Richmond)*

> *The members of the Outdoor Recreation Council are pleased that government is moving towards more intensive management of commercial backcountry recreation operations on Crown land. (Outdoor Recreation Council of B.C., Vancouver)*

> *The B.C. Wildlife Federation recognizes the need to regulate and administer the development of recreational activities in the backcountry. We are tired of having to confront every entrepreneur that believes he has the divine right to make a dollar at the expense of wildlife, the landbase and the rights of our members. (B.C. Wildlife Federation, Surrey)*

> *We appreciate the fact that rules and regulations have to be put into practice regarding the control of commercial use of the backcountry and we commend the government for realizing this. This is going to prove an immense undertaking and not everyone is going to be satisfied. But with honest approaches by the government and users alike, it can, in the end, benefit everyone that enjoys the outdoors. (B.C. Snowmobile Federation, Revelstoke)*

Some of the comments were not as favourable. A few individuals suggested that BC Lands should not be involved in this type of policy development or that there is no need for policy with respect to commercial backcountry recreation.

> *It is your job to be the caretaker of the resource for the people of the province. You have no right to exploit that resource for the benefit of the few. (David Prosser, Prince Rupert)*

> *It is the stance of the Kootenay West Share Society (Slocan South) that the commercial backcountry recreation on Crown lands in British Columbia proposal be scrapped in its entirety on the grounds that it will put very little if nothing into our economy... (Kootenay West Share Society, Slocan)*

> *Please leave the Crown lands as they are! (Gerald Thibault, Lumby)*

> *In an already over-regulated tourist service industry, this policy proposal is a backward leap. It must never be forgotten this is a small business self-regulating industry. (Snowy Mountain Outfitters Ltd., Fort St. James)*

General Response to Commercial Backcountry Recreation

The commercial backcountry recreation industry was clearly seen as a boon to B.C. by some respondents. These people felt that adventure tourism should be encouraged as it could provide economic benefits to resource dependent communities and improved access to the backcountry for outdoor enthusiasts.

> *It is becoming ever more obvious that some sort of development must take place or secondary industry must be established in order for this community to remain economically stable. (Elaine Bennett, Likely)*

> *With proper monitoring and control, an increase and diversity of outdoor recreation opportunities in B.C. would be achieved. (Victoria Fish and Game Protective Association, Victoria)*

...I feel the province of B.C. has the potential to be a real leader in tourism based industries and will eventually be able to offer far greater community benefits for both social and economic sectors ... (Blanket Mountain Outfitters, Vernon)

The District of Tumbler Ridge would like to see the commercial backcountry recreation industry fostered and encouraged by the province of B.C. We feel this industry is essential towards diversification of our local and regional economy... (District of Tumbler Ridge)

However, several other respondents felt that development in the backcountry should be limited or stopped altogether. Fear of damaging the wilderness or disturbing wildlife motivated the majority of these comments.

I do not feel we should pursue any additional commercial backcountry recreation. There is more than enough as is... (J. Fukumoto, Enderby)

...uncontrolled development will spoil these remote areas for future generations. Development means people; people means pollution. (Phil Zak, Sicamous)

We...believe that the establishment of permanent backcountry lodges, corrals, etc. will detract from a true wilderness experience for those who are willing to make the physical effort to attain it. And we have grave concern that facilitating use of the backcountry by people who do not have knowledge of, or sympathy with, wildlife will result in conflict with wild creatures. (Green Party of Canada, Kamloops)

Yes, we need some lodges, outfitters, etc., to allow visitors to enjoy the beauty we have. But their proliferation should never be considered with one eye on the till. Once we maximize the backcountry profitability, we will find ourselves in the crowded front country, the door behind us tightly shut. (Denny Petrik, Duncan)

Managing or developing "wilderness" is a contradiction in terms. "Wilderness" cannot be exploited in a large way without destroying its very nature. (George Colgate, Nemiah Valley)

We do not agree that the Crown should support development of a commercial backcountry recreation industry. In fact your goal should be the opposite; you are stewards of the land for the citizens of British Columbia. (Peace/Liard Wildlife Association, Charlie Lake)

Planning, Inventory and Carrying Capacity

The discussion paper proposed that commercial backcountry recreation applications would be evaluated against existing land use plans and studies. However, where land use plans did not exist, it was further proposed that applications would be evaluated on their own merits by weighing the social, environmental and economic benefits and costs of the proposed development. Only a few respondents expressed support for this proposal.

We also agree with the need to get on with the process rather than wait indefinitely for a land use plan to be formulated. (Robson Helimagic, Valemount)

...the G.O.A.B.C. believes the Province cannot afford to wait until this information is fully available to set limits on use in these areas. An alternative to detailed research at this point in time is the involvement of local individuals in the planning process who have knowledge of the resources of the area in question. (Guide Outfitters Association of B.C., 100 Mile House)

A significant number of respondents felt that evaluating commercial backcountry recreation developments based on social and environmental criteria would not be enough, and that a broader land use planning perspective is needed before such land use rights can be allocated.

Because these (land allocation) decisions may tie up land for decades it is appropriate to have a land plan in place. There is a duty upon the Ministry to wait on current proposals, until it has the information acknowledged in the paper as being "essential". (John Thornton, Banff)

...land use planning must be furthered before long term backcountry opportunities are tendered. In the absence of a land use strategy, only short term tenures should be considered. (Lignum Ltd., Williams Lake)

Without an overall policy to guide the granting of land use rights to commercial operators, the industry is cast into a potentially hazardous position. The land which is suitable for this industry's use is limited and...that land must therefore be utilized in the most effective means possible, which can only be determined after a complete inventory is taken. (Company of Adventurers Wilderness Guides, Vancouver)

A few individuals gave very detailed lists of what must be accomplished before any land is allocated to commercial backcountry recreation.

(BC Lands should consider:) 1. Assisting in an inventory of our forest resource. 2. Completing the minimum park system. 3. Completing the wilderness strategy land reserves. 4. Setting aside a responsible amount of various old forest systems. 5. Restoring the fish-bearing streams where logging has wiped out the rich runs. 6. Completing the ecological reserve systems. 7. Sitting down with Native people to plan their needs, rights, and wishes. 8. Preparing a plan to achieve an inventory of quality and quantity of land and resources of the B.C. land and water base. (M. Buchanan, Comox)

Some respondents expressed concerns over the governments' ability to carry out land use planning and to assess the social and environmental carrying capacity of backcountry areas.

> *It is...hard to imagine that the ecological carrying capacity of a mountainous area will be measurable within the foreseeable future in British Columbia. There is no body of data and experience on which studies could be built and no qualified personnel to acquire it, let alone funding. (Bear Enterprises Ltd., Smithers)*

> *In spite of the discussion paper's assertion that traditional public use and ecological limits of the land would be protected, there is no policy or money to develop a thorough inventory or understanding of these two vital issues. (Tadya White, Invermere)*

> *How can you possibly "inventory" conflict areas and ensure (that) everyone, including me, gets the freedom to enjoy the Crown lands? (Janice Strong, Cranbrook)*

> *How will the Ministry of Lands and Parks actually carry this objective out when it has neither the staff, budget nor expertise to carry out the required planning, impact analyses, implementation, coordination and supervision of their proposals? (Bell Pole Company Ltd., Lumby)*

A few individuals stated that the carrying capacity in their areas has already been reached or exceeded.

> *To think that there are plenty of opportunities left for new potential backcountry recreation sites in the interior of this province is being naive...There are few of these quality products left due to logging extraction. (Eliguk Lake Lodge, Nimpo Lake)*

> *...in the East Kootenays and elsewhere in the province almost all of the good areas are already occupied. (Don Bullock, Cranbrook)*

Public Access

Almost every submission commented on the issue of public access to Crown land. The proposed policies stated that traditional and future public use would be a prime consideration when evaluating commercial proposals. They also stated that public use would be allowed in all areas of a commercial operation, except on authorized physical improvements that have been built by the operator. Physical improvements could include lodges, campsites and possibly trails.

Many respondents expressed concerns that their right to access Crown land would be reduced or eliminated through the proposed policies.

> *...the paper does not specifically state that public access is the first priority of your ministry. It must be. (form letter, 31 respondents)*

> *I am worried that if a commercial enterprise takes over an area in which myself and my family go for outdoor recreation that I may be shut out or denied access or have to pay to gain access to the lands which I have had a tradition of unencumbered use. (Brian Grouhel, Ladysmith)*

> *...I, as a snowmobiler and a year-round user of the outdoors, object in the strongest possible terms (to) any restriction of the public's right to free access of Crown land. (form letter, 16 respondents)*

> *If I read this correctly, an operator might conceivably upgrade the trail to my favourite mountain lake, just off the a backcountry road, and I would be required to pay a fee for access or, worse still, be denied access altogether. There is nothing in the proposed policy which says this will not be the case. (Mark Conlin, Kelowna)*

> *The paper is not specific enough on such matters as public access. Where are the guarantees that we can continue to use our own province's recreational resources? (Fort Fraser and District Trappers Association, Fort Fraser)*

Most respondents generally accepted the commercial operator's need to restrict public access to lodge facilities and other small, specific-use sites. However, the potential for a commercial operation to restrict public access on trails raised concerns for a number of individuals and groups.

> *...the operator may exclude the public from his buildings and nearby developed grounds; however, we do not agree that he should be able to restrict public access to undeveloped land, roads or trails upon Crown lands. (Bulkley Valley Rod and Gun Club, Smithers)*

> *While it is quite reasonable to exclude the public from facilities such as lodges and campsites, we feel free access to backcountry areas should be maintained. The public should not be excluded from trails, corridors, extensive areas, or special features. (Nuit Wilderness Society, Tatlayoko Lake)*

> *I think it is wrong to give exclusive licenses to protect possible investment in trail building, whether for foot or ski traffic. One problem is that the trails are likely to be built in those areas most accessible to other users in any case. They become difficult to avoid and their presence distracts from the experience of others. (Darrel Woods, Victoria)*

A few respondents agreed that on regularly groomed trails the operator could charge a small user fee.

> *Where commercial operators regularly groom cross country ski trails, I agree that the public should expect to pay user fees. If skiers wish to reach ungroomed ski touring locations beyond the groomed trails, maps and signs should indicate a specific "no fee" route for skiers to access those ungroomed areas. (Ian Clay, Salmon Arm)*

Another point made by many of the respondents was that public use should be given priority over commercial backcountry recreation use of the land. When the carrying capacity of an area has been established, it should be allocated first to public use and only the remainder made available for commercial operations.

> *Public access should not be limited in support of commercial ventures. (Fred Fowler, Kelowna)*

> *...under no circumstances should the public's use of Crown land be considered second to any commercial venture. (Stuart Knuff, Revelstoke)*

> *When carrying capacity is considered, and when there is a restriction as to how many people may be allowed in an area, then we believe that the people of B.C. should not be the ones who sustain the reduction. (Associated Wildlife Preserves, Surrey)*

> *We strongly recommend that no commercial development take place where there is even the slightest possibility of infringing on traditional public use, even if it is only a few berry-pickers. (Revelstoke Rod and Gun Club, Revelstoke)*

> *We insist that the right of public access to Crown lands for the purpose of recreation be enshrined in the law, and the rights of the B.C. resident to free access to recreate in the backcountry take precedence over all commercial recreational permits, grants, licenses or warrants. (Williams Lake Sportsmen Association, Williams Lake)*

A number of respondents expressed the feeling that access to Crown land is, or should be, an unalienable "right" of every citizen.

> *I, like many other citizens of this province, have always considered the recreational use of land owned by the province as my inherent right. I feel that leasing Crown land to industrial and commercial users for their exclusive use is an infringement on the rights of every citizen of this province. (Betty Beech, Revelstoke)*

...I consider it my right to roam freely in the backcountry because I feel that as undeeded land it belongs to the Canadian taxpayers and all taxpayers have the right to use, but not abuse it. (Sari Cox, Vernon)

The citizens of Canada should have total unfettered absolute access to the Crown land of Canada. This should not be a "consideration" to be weighed against other considerations; it should be an unalienable right. (Mr. and Mrs. Fowler, Salmon Arm)

However, other people expressed the need for some restrictions to public access. In many cases these arguments were based on a need to protect the wilderness.

In (an) effort to protect wildlife habitat and wild places, I do not support the argument that providing access to wilderness areas is a good thing. (Brian Allaert, Courtenay)

The total number of humans and the type of use must be strictly limited, monitored and enforced. Total acceptable numbers will include the non-commercial and the commercial users. (Connie Harris, Salmon Arm)

Use of backcountry Crown land for recreational purposes is a privilege. Such privilege carries with it the responsibility to protect the resource. Protection can best be achieved through: a. Increased education of individual users. b. Specialized training for organizers, both non-profit and commercial. c. Enforced codes of conduct for all user groups. d. Controlled ceilings on usage numbers. ...we suggest that the time has come to recognize that any and all use of backcountry Crown land for recreational purposes is a privilege and not a right. Such privilege carries with it an onerous responsibility to protect the resource. (Mike Wiegele Helicopter Skiing, Banff)

In particular, restrictions on motorized access was cited as a need by several respondents.

> *...mechanized sports and those without the aid of motors are conflicting activities and are mutually exclusive. One cannot have a truly wilderness experience while helicopters are landing a picnic party on the same peak that a mountaineer is climbing to... There should...be large buffer zones, where possible, between motorized and non-motorized activities. (Gordon Reid, Bowen Island)*

> *...mechanized recreational activities bring serious pollution to the environment, motor exhaust, oil and gas fumes, and most destructive of all, particularly in the case of helicopters, tremendous noise pollution. (Society for Soundscape Awareness and Protection, North Vancouver)*

> *The use of helicopters to remote locations may have a disturbing effect on wildlife. (Mara/Shuswap Property Owners Association, Salmon Arm)*

> *As wilderness recreationists, we find that mechanized backcountry travel, which includes many commercial operations, is incompatible with the wilderness experience we seek and we welcome your efforts to regulate commercial backcountry use. (The B.C. Mountaineering Club, Vancouver)*

Some commercial operators also felt that some restrictions on public access are required, generally in order to protect their businesses.

> *When extensive public use of an area destroys the viability of an ongoing commercial backcountry recreation business, the question needs to be asked: are the social and economic benefits derived from public use as great or greater than those derived from the commercial operation? (Canadian Mountain Holidays, Banff)*

...in cases where the commercial user has precedence, meaning that no public use was in evidence prior to the commercial development, care should be used as to the forms of access allowed. Once a touring company has opened up a ski touring area, for example, skidoos could destroy the business. (Golden Alpine Holidays, Golden)

Where was the public, where were the investors, where was the government when the pioneers worked day and night to create this industry, and when no one recognized the value of it? Now that there is easy access, the government's attitude is: the public's rights are more important than those that built the industry. The public benefits from efforts of commercial operations in the back country with no effort on their part. (Ridge River Resort, Williams Lake)

Aboriginal Land Issues

The discussion paper included the commitment to ensure that policies for commercial backcountry recreation would be consistent with evolving provincial policy on aboriginal land issues. Also, commercial backcountry recreation proponents would be required to confer with relevant Native groups.

Very few respondents commented on this issue. However, most of the individuals who did felt these proposed policies do not go far enough.

I think aboriginal land claims must be settled prior to any land use allocation. Sending the aspiring proponent to "confer with appropriate Native groups" is just not good enough. (Linda Morris, Revelstoke)

It is both unethical and immoral for this government to proceed with this program without a complete settlement of aboriginal land claims, and sovereignty issues. (Hills Watershed Committee, New Denver)

...in closing we the Aboriginal people would like a moratorium on any sale or development of Crown lands until land claims are settled. (First Nations of South Island Tribal Council, Mill Bay)

On the other side, some respondents protested against the "special treatment" proposed for Native groups.

We question the need for proponents of commercial backcountry recreation to consult with Native people. The courts have recently ruled against Native land claims in the North. Your policy gives credence to their "claims". Further, it is not democratic in that it singles out one minority, not all interested parties, for consultation. (B.C. Federation of Fly Fishers, Vancouver)

Competitive Process

The discussion paper proposed that a competitive process would be used in order to select the best proposal, and to ensure fair and consistent treatment of all applicants. Public response to the use of a competitive process was mixed. A few individuals and groups supported this allocation method, while others expressed doubts about the competitive process.

It (a competitive process) will provide the maximum return to the province and also create the least opportunity for undue influence, political or otherwise. (Share Smithers, Smithers)

A major flaw in the proposed policy is the competitive bidding process as it will cause immediate escalation of costs, encourage speculation, and force bid prices beyond the ability of potential local residents and investors. (Golden and District Rod and Gun Club, Golden)

...competitive bidding does not ensure the greatest benefit or suitability of a proposal. (New Caledonia Canoe Club, Vanderhoof)

> *The reason I see the competitive process as a serious problem is (1) because it discourages initiative in doing good ground work and planning in the potential recreation business operator, (2) it tends to change the focus of good managers from things like protecting the environment they are using to problems of cash flow and insecurity in their business, (3) anything that potentially increases the dependency of an operator on banks can only be detrimental to the environmental or sustainably benign impact aspect of such a business. (Gordon Carson, Valemount)*

Some respondents also expressed the concern that a public bidding process could place the initial applicant at a disadvantage.

> *The competitive bid is not fair. Someone does all the groundwork then loses out to someone who has all the money. (Elizabeth Norwell, Valemount)*

> *Utilizing the multi-agency referral system and extensive public review renders the competitive bid process ineffective as it discriminates against the initial application and invites the pirating of the original proposal with minimal alterations. There is no protection of confidentiality in a public referral system. (Cariboo Regional District, Williams Lake)*

Concerns were also expressed that small businesses would "lose out" in the competitive process.

> *If there is not a process in which the small or family operation can bid on these rights before they are advertised internationally, there will be no way that they can compete with large foreign investment... (North East Packers Association, Charlie Lake)*

We, the small business community, cannot compete with these large corporate companies, whose value scale is only monetary. (White Water Voyageurs Ltd., Golden)

If these proposals are adopted as policy, then it is not feasible for a small operator to consider undertaking any business involving backcountry recreation on Crown land! (K.W. Tempelman, Campbell River)

The proposed policies stated that the competitive tendering process would include social and environmental criteria as well as economic considerations. However, many respondents expressed fears that the desire for financial returns would override social and environmental concerns.

You say that environmental considerations will be taken into account in every transaction, but history has proven time after time that money comes first, and the environment comes second. (Brian Rigler, Salmon Arm)

While we can appreciate that the competitive process can be assumed to realize the full economic potential from the backcountry recreation resource in the short term, we would caution that it can produce exploitation, alienation, and strife in both human and non-human communities. In addition, we would caution against maximizing the economic potential of this resource use. Unavoidably, when this is the first priority, decisions are made that ignore long term degradation for short term gain. (Guiding Hands Recreation Society, Crawford Bay)

I do not believe that there should be any rental paid to the government for the use of these lands. This idea encourages the possibility that the rental fee offered by tenders will become the primary factor by which the "competitive" process will be judged. By getting rid of any rental fee this will hopefully preserve sustenance of the environment as the principle behind deciding on tenders. (Peter Pare, Vancouver)

A large number of people believe that environmental criteria should be foremost in importance when evaluating proposed developments. Social criteria are also critical, however, they are generally secondary to environmental concerns. Economic benefits should be given consideration, but should not be the first priority.

> *In all cases, environmental objectives must override social, aboriginal, and economic objectives - not the reverse, as shown in the discussion paper. (Valley Outdoor Association, White Rock)*

> *If loss of wildlife habitat or overcrowding by recreationists will result from a commercial venture then the venture should be scraped. (Mike Laursen, Black Creek)*

> *The competitive process for allocating Crown land must not put revenue ahead of ecological values. To endanger the ecosystem forever for quick bucks is self-defeating. (Diana Angus, Duncan)*

> *Any decision and planning processes must ensure that the ecological integrity of these areas are protected. Ecological concerns must be the primary consideration, not economics. (Jan Homford, Marysville)*

> *I ... propose the following goals, to be applied to all considerations of Crown land, present and future, in order of highest to lowest priority: 1. To protect habitat for endangered, threatened, and rare species; 2. To ensure justice for aboriginal people and to avoid threat to their culture; 3. To ensure the right of access of local citizens to wilderness recreation; 4. To ensure that the greatest possible amount of any economic benefit derived from the land stays in British Columbia. (B. Shorter, Cranbrook)*

The proposed policies set out in the discussion paper stated that commercial backcountry recreation opportunities would be offered on a local, national, and international basis, as appropriate. The individuals and groups that commented on this proposed policy all clearly expressed a desire for preference to be given to local B.C. operators.

> *Small, low impact family operations, able to supply local needs, should be given consideration over international investors... (Beaverfoot Lodge, Brisco)*

> *I cannot help but be appalled at ... selling out the rights of our backcountry Crown lands to national and international bidders. (form letter, 33 respondents)*

> *Foreign companies will take profits out of Canada and local interests may not be able to compete with large foreign investors. (Ian Hourston, Prince Rupert)*

> *B.C. residents should have the first opportunity to bid on the proposal. Offshore and multi-national applicants may not have the same respect for the land and the laws of B.C. as a resident would. (Four Wheel Drive Association of B.C., Surrey)*

> *The wilderness areas of this country can wait until Canadian companies are able to use them. There is no rush to have foreign business control our wilderness. (James Clark, Salmon Arm)*

> *Preference should be given to local operators and then to Canadian residents; when it is deemed necessary to consider non-Canadian individuals or companies, a legislated public input process should be required to make that determination. (Roy Howard, Dunster)*

The discussion paper also proposed that existing operators would have to go through a competitive process to obtain any additional commercial backcountry recreation rights. A number of respondents commented that existing operators should be given special consideration - either by foregoing the competitive process entirely or by giving preference to existing operations in some more limited fashion.

> *Although the competitive process is generally preferable, I feel that established operators should have some special rights in some circumstances. These special rights would recognize these operators' roles in pioneering the backcountry recreation industry. (James Wright, Canoe)*

> *Having invested..time and money to prove that heli-hiking is a viable business, it seems unfair to have to compete in our chosen areas with someone who has not exhibited the same level of commitment. My suggestion would be to grant rights to existing operators and begin the policy of competitive process with all new proposed operators. (Crescent Spur Helicopter Holidays, Crescent Spur)*

> *This proposed policy (competitive process) would be punitive to existing businesses such as big game hunting and fishing. (form letter, 6 respondents)*

> *In the case of an established operator applying to expand his business, I feel that the track record and suitability should be strongly reviewed. (Peter Koppe, Prince George)*

> *In existing guide-outfitting areas, at least a 10% contiguous area to be identified by the guide outfitter licensee should not be available for other backcountry recreation uses; the guide-outfitter should have exclusive use in that 10% contiguous area, for a value-added fee to be established. (Fort Nelson-Liard Regional District, Fort Nelson)*

The discussion paper proposed that each commercial backcountry recreation activity would generally require a separate application. A few respondents agree with this process, but several others are strongly opposed to it.

> *I do not see any problem with a separate application for each commercial recreation activity as long as there is not a non-refundable application fee for each application. (Nanika Guiding, Burns Lake)*

> *Our members feel that the granting of multiple rights could preclude other operators and resource users from having access to what is effectively public land. (Interior Lumber Manufacturers' Association, Kelowna)*

> *What is a separate activity and how are they defined? We list over forty activities that we offer...Are you going to expect us to bid on all of these separately? (Beaverfoot Lodge, Brisco)*

> *...multi activity, all season rights should be encouraged rather than discouraged. (E.D. Blix, Smithers)*

> *The G.O.A.B.C. suggests that the discussion paper's approach of licensing each activity is not appropriate for the tourism industry. The alternative in which we propose is one in which the tourism operator would apply for one license to cover their primary activity as well as ancillary activities which would normally be offered by the operator as supplementary products to the main business or casual activities... (Guide Outfitters Association of B.C., 100 Mile House)*

The process of reviewing applications also received some comments. Several commercial operators expressed concerns that BC Lands' application process for commercial backcountry recreation could be very lengthy and time consuming.

What is being proposed is a bureaucratic nightmare - and the advantage will go to the big corporate operator, the outfit with the staff, the time, and the money to make the most convincing presentation. The guy who will lose is the local operator who is trying to do it all on his own. He does not have the time to do all the paperwork. (Tweedsmuir Lodge, Bella Coola)

...a strenuous effort needs to be made to avoid the creation of a "never ending" review process. This can be accomplished by stating clearly in the policy: all the issues which need to be addressed in any proposal; how they need to be addressed; all the agencies and other bodies who are to review such proposals; in which order they will review them; how long each will have before a decision must be made... (Canadian Mountain Holidays, Banff)

Pricing

The proposals contained in the discussion paper stated that pricing for land use rights would have two components, a lump sum "bonus bid" to acquire rights, plus annual rental based on a percentage of gross revenues. Respondents were generally against the use of a bonus bid.

The concept of bonus bids in the land use pricing policies would, in our view, be very detrimental to business development. This would particularly affect small business development, being, in effect, a direct penalty to initiative and energy of the small entrepreneur whose limited capital could be much more effectively used in developing the business. (Mistaya Alpine Tours, Golden)

A lump sum payment for a Crown land lease will greatly diminish the opportunity for a small business trying to get started. (West-Coast Cat-Skiing Ltd., Whistler)

...highest "first cash bid" is a difficult concept for several reasons: 1. the higher bidder could offer an inflated price with compromise in the environmental and social economic criteria. 2. competition on "first cash bid" basis may deplete the resources of winning bidders to complete and operate proper facilities. 3. bids could generate real estate speculation 4. politically it is difficult to reject the highest bid even if only marginally higher than a better, lower bid 5. excessive monetary demands or offers inflate costs and can limit the affordability of a backcountry experience to only the wealthy. (Wildcat Hills Enterprises Ltd., Cochrane, Alberta)

Reaction to the "percentage of gross" pricing mechanism was mixed, with an almost equal number of respondents supporting this proposal as those arguing against it.

I do agree with "rent" as being a percentage of gross revenues. (Kevin Wiley, Revelstoke)

Annual rent, set at a specific percentage of a company's gross revenue, is an ideal way to generate government revenues as it provides an incentive for the government to work with the industry and it is the sum which can be easily included in the industry's price structure. (Company of Adventurers Wilderness Guides, Vancouver)

Percentage of gross does not reflect the large variances in cost of transport...An annual rental based on percentage of actual revenue per person per day would be fairer and less arbitrary. (Ptarmigan Tours, Kimberley)

We are against tying fees to a percentage of gross revenues as this smacks of government partnership in private enterprise. At some point, the fees for the land use must have a ceiling, beyond which the operator is rewarded for increasing efficiency. (Robson Helimagic, Valemount)

The discussion paper included a proposal that the Crown may require a share of the financial benefits resulting from a transfer of land use rights. The public response to this proposal was strongly divided. Some individuals expressed the feeling that the government had no right to a share of the value of the land rights upon which their business was based. Other people felt equally strongly that rights to use Crown land should not be transferrable, and that the government and people of British Columbia should be the recipients of any increase in value.

I have built my backcountry business by hard work and good service to my clientele. Because of this the business would probably have a substantial "goodwill value" if it were sold. I cannot see why the Crown should be entitled to a share of this especially when they had no part in the development of it. (North Rockies Ski Tours, Prince George)

Since the Crown is only providing an opportunity to conduct a commercial venture on public land and has nothing whatever to do with efficiency, success, or the level of income from the business, there is no justification for the Crown having a further share of gross revenue or in taking a share of the profit resulting from eventual sale of the business. (Mistaya Alpine Tours, Golden)

Tenure holders should not be able to make huge profits on something that does not belong to them. (Lake Windemere District Rod and Gun Club, Invermere)

Transfer of rights should be retained by the government. The lessee should be able to sell his assets only plus 10% for good will. Any surplus over and above this should be used for environmental and game enhancement. (Dudley Wagner, Charlie Lake)

It should be a rule that all lands used in any Backcountry Recreation proposal do not have a value to the developer and are on a yearly use and are not transferable, since they still belong to the original owner - the taxpayer. (Lynn and John Bremner, Oliver)

Commercial access to Crown land should not be an appreciating asset except to the provincial government (the people of B.C.). Developers should have right to appreciation of capital cost installations such as buildings, wharves etc. but not to Crown land. (Richard Smith, Salmon Arm)

Nature of Rights

The discussion paper set out a range of land use rights which could be used in certain circumstances. The sale or lease of land was proposed for small areas involving high levels of investment (e.g. lodge facilities). Licenses and permits, which do not give the holder the right to exclude other users, were proposed for trails, strategic sites and extensive use areas.

A significant number of respondents did not agree with the sale of Crown land, even in limited circumstances.

Please do not allow the sale of land rights because we have no clear knowledge of what it is we would give away. (form letter, 31 respondents)

Under no circumstances should Crown land be sold. Without the Ministry (of Lands and Parks') protection, sustainability of the environment, wildlife, and the industry would be threatened. (Northwest Wildlife Preservation Society, Vancouver)

Don't listen to the commercial operators. Why do they need exclusive use or rights? I think the only exclusive rights of use they need is the small portion of land their facilities sit on. (Allan Coburn, Revelstoke)

This club is opposed to the sale of Crown land for commercial use. Lease arrangements would be acceptable as long as the duration of the lease is no longer than ten years and a review process is in place to assess the renewal of such leases. (North Shore Hikers, no address)

The industry, however, felt that the level of land use rights proposed in the discussion paper were not sufficient.

> *The net effect of the proposed policy is that (BC Lands) wishes to retain all rights unto itself, conveying nothing to the proponents but a tenuous authority to use certain lands. These policies will be wholly unacceptable to all proponents except those in business with virtually no start up costs or capital investment. (Mike Wiegele Helicopter Skiing, Banff)*

> *Having to pay a license fee to use land with absolutely no guarantee of tenure is unfair, the lack of tenure is the one reason why banking institutions are so hesitant to back tourism developments. (Osprey Angling Guide Services, Lone Butte)*

A few commercial operators argued that there is a need for exclusive land rights.

> *Exclusive rights to an area may sound extreme, but in some cases we feel it is the only way to preserve the "product" these companies offer. (Golden Alpine Holidays, Golden)*

> *With no exclusivity to tenure, the door has been opened for continuous conflict with the subsequent result that the operator continues to lose value in his investment. (Canada West Ski Areas Association, Vernon)*

Some respondents were very concerned over the proposed policy that land rights could be modified without compensation.

> *Modifications of recreation licenses or permits without compensation would be punitive to existing resource users. Fair compensation for fair value has long been recognized in law. (R. Hamblin, Houston)*

This proposed policy would not encourage the creation of a quality product... If a publicly-agreed-upon land use conflict or need arises, then the operations involved must be given fair market value in compensation. (Fishing Resorts and Outfitters Association, Kamloops)

A few respondents stated that the rights presented in the paper are not appropriate for their type of operation. Two distinct groups felt different forms of rights were required. One group was commercial operators involved in non-capital intensive "roving" types of activities, photo tours and mountaineering for example. The other special category was for non-profit educational groups such as Outward Bound.

Photographic tours are my interest....It would be impossible for me to go through this land allocation and competitive process for this kind of short term use. Perhaps a short term permit or province wide license would be in order. (Ted Nugent, Smithers)

Mountaineering usually needs no fixed infrastructure and needs to be variable as to its area; once a client has climbed a peak he or she will want to try another. The same goes for trekking. Such ventures do not figure in the paper and it is to be feared that quality-oriented operators will be shut out of areas because the right to their use has been given away. (Bear Enterprises Ltd., Smithers)

...it is not clear to us how it is intended that we should fit into the process. As we are providing social and educational services, how will our operations be recognized when allocating licenses to commercial operators? (Outward Bound Western Canada, Vancouver)

Resource Management and Conflict Resolution

The discussion paper stated that commercial backcountry recreation proposals would not be approved where the potential environmental or social impacts are considered to be high. Some respondents believe that this is not sufficiently stringent.

It is not acceptable that commercial backcountry recreation proposals will not be approved where impacts are considered to be "high". Prior to approvals being given, it must be reliably demonstrated that impacts will be negligible... (The Sierra Club of Western Canada, Victoria)

The paper also proposed that proponents may be required to undertake an impact assessment. This was understood by some people to mean that the commercial operator could do his or her own impact assessments. It was argued that this would not be appropriate.

An independent, impartial agent, not the proponent, should be required to assess the impact of the proposed development on the backcountry. (Lisa Baile, Vancouver)

There must be an impact study funded by the developer for each proposal and a management plan developed and agreed to by all interested parties prior to the issuing of any form or tenure. (B.C. Wildlife Federation, Surrey)

The policy proposals for resource management and conflict resolution focused on the use of management plans. Respondents reacted favourably to the concept of management plans, however, several felt this did not go far enough. A number of respondents felt that annual reviews and/or performance bonding should be included as a part of every management regime.

The management plans..do not go nearly far enough. Any commercial backcountry recreation license issued should use the Ministry of Forests system, whereby the licensee is required to produce a Management and Working Plan, Five Year Development Plan and annual reports. Any planned activities must first be referred to appropriate government agencies and other licensed users for comments/ approvals, and open houses must be held annually to allow for public input. (Bell Pole Company, Lumby)

Once a business is established, its performance should be monitored on a regular basis, on the ground, to ensure everything is "going to plan". (Norman Telford, Alexis Creek)

The policy should require that a good behaviour bond, of a substantial amount of money be posted. Such a bond would be forfeited if the conditions of the licence are violated...In the absence of such an incentive, some existing operators can routinely violate the conditions of their licence with impunity. (Federation of Mountain Clubs of B.C., Victoria)

As an alternative to bonding, government should offer low cost insurance programs available to all operators at a low monthly fee to accumulate a fund which would be reserved for correcting performance problems. (ABC Wilderness Adventures Ltd., Golden)

Some respondents expressed concerns regarding the government's ability to properly manage the resource and to resolve conflicts between users.

The government does not have a good history of protecting and managing our right of access, the existing hunting and fishing resource, or for that matter, any of our natural resources. (form letter, 113 respondents)

Staffing and funding limitations often restrict government staff to do no more than pay "lip service" to various policies and procedures, despite their sincere desire to follow them. (R.L. Johnson, Queen Charlotte Islands)

Compatibility is, however, somewhat subjective, and there is no identified mechanism for evaluating what is, and is not, compatible, nor for resolving conflicts. (Regional District of East Kootenay)

Safety

Only a few individuals or groups commented on safety issues. Most agreed with industry self-regulation, but argued that government should take an active role in assisting and encouraging the industry to develop safety standards. In addition, government should ensure backcountry guides are properly trained and fully qualified.

> *Industry regulation is best done by the industry and its members...There are many associations which can set standards and regulations for the safety of the client in the adventure industry. (Great Canadian Wilderness Tours, Vancouver)*

> *...it is...in the government's best interest, to take a stronger role in assisting in the development of standard safety guidelines to help protect those participating and, in so doing, foster a healthy reputation for backcountry adventure. (Peace River Regional District, Dawson Creek)*

> *...where access is granted to guided commercial activity, we would like to ensure that the activity is undertaken and led by competent, qualified leaders so that safety is not compromised. (Bicycle Association of B.C., Vancouver)*

> *Commercial recreation operators should be required to hire properly trained staff, who are accredited for guiding the appropriate activities. This requirement will contribute much to ensuring client safety....expanded cooperation (on safe and wise use) ought to be facilitated between government, commercial recreation operators and outdoor recreation organizations to further these awareness-building initiatives. (Outdoor Recreation Council of B.C., Vancouver)*

Other Comments

Comments on Public Input

A significant number of respondents commented on public input processes. The opportunities for public input into the development of policies for commercial backcountry recreation were considered to be inadequate by some individuals.

> *...before you follow through with "next steps" think about a few public information meetings similar to those held...by Parks Plan 90. (Allan Brooks, Black Creek)*

> *Before any leases or permits are issued, I'd like to see the following: a public hearing process to address length of leases, foreign investment content, roading, the percentage of Crown land alienated (with a top limit in place), final use of revenue generated, environmental impacts, and any restrictions or limitations placed on public use... (Jack Barrett, Lasqueti)*

> *Province-wide public hearings should be scheduled to gain public input into the second draft. (East Kootenay Environmental Society, Invermere)*

> *I should hope the public has a chance for further review of the final policy before it becomes law. (Mr. and Mrs. Simonson, Hudson's Hope)*

Several people provided comments and suggestions regarding public input into the evaluation of proposals. The discussion paper suggested the use of a "panel of experts" to evaluate proposals. A few individuals were concerned that the panel might not represent their views.

> *...I fear that the consultation process will be one of smoke and mirrors with no action...who will constitute the "panel of experts"? I fear that the experts will be hand picked to represent other than the public interest. (Laurie Rockwell, Summerland)*

Will this panel include locally informed residents? How will the selection be made? Will these "experts" be people whose interests may be that of the shareholder? (Nancy Guise, New Denver)

I have no faith that a multi-agency review panel will serve to effectively protect public land regarding major commercial backcountry recreation proposals involving multiple rights. Many members of the public believe previous review panels have best served industry rather than the public good. (Sue Maclean, Nakusp)

In general, a review panel that includes local and regional representatives would be preferred to one that consisted of professionals.

Are experts limited to professionals? I hope this would include user groups, as they more often have better local understanding and on-the-ground experience. (Dave Smith, Summerland)

Any such panel has to include people from the areas in question and the government would do well to include these people - they can offer a better knowledge of the lands in question. (B.C. Snowmobile Federation, Revelstoke)

1. Build upon the provincial application referral and newspaper notice system, which is proposed in the discussion paper to solicit local government and public comment by establishing a Review Board. This review board would: a) consist of concerned provincial government agencies, local government, Native interests and public interest groups b) represent areas similar to regional district boundaries c) planning decisions would be based upon a consensus decision making model. 2. The review board could potentially be used to: a) access applications for backcountry use b) modify proposed application plans and tenures c) provide a body for review and conflict resolution between resource users and public concerns. (Sunshine Coast Regional District, Sechelt)

Some respondents felt that an additional process was needed in order to allow individuals and groups outside the specific local area to comment on proposed developments.

> *How will the Ministry (of Lands and Parks) ensure that the public will be consulted? This is a large province and there are a great many users of specific backcountry areas that are not residents of communities close to these areas... (Okanagan Similkameen Parks Society, Summerland)*

> *The Ministry of Lands and Parks should create a mailing list of groups and individuals interested in making comments on commercial backcountry recreation proposals. A short description of each proposal that is being considered by the Ministry of Lands and Parks should be sent to the mailing list... (The Federation of Mountain Clubs of B.C., Vancouver)*

Comments on Land and Resource Use

Several respondents expressed concerns over land and resource use. Conflict between the commercial backcountry recreation industry and timber and mining interests was clearly evident in a number of comments.

> *The tourism industry, which includes guide outfitters, fishing lodges and resorts, guest ranches and adventure travel needs land - land that is free from mineral extraction and logging. (Tsuniah Lake Lodge Ltd., Williams Lake)*

> *After much research into recreation pursuits in this province, it is our opinion that further erosion of our land base for these types of opportunities will add very little to the coffers of B.C... by implementing such an enterprise we also stand to lose more lucrative industries, such as mining, cattle ranching, and forestry. (Share Our Resource Society, Port Alberni)*

Tourism must become an equal partner in resource management decisions... No land use decision should be allowed to alter the character of the resource so much that other existing and future uses are impacted. All parties must agree if an area is to be sacrificed to a single use. (ABC Wilderness Adventures Ltd., Golden)

Northwest Guide and Outfitters Association is extremely concerned that many of the internationally significant fish and wildlife values of our region are at the fate of poor land use management, excessive timber harvesting, un-regulated mining exploration and un-checked waste. (Northwest Guides and Outfitters Association, Smithers)

Backcountry commercial operations, when granted, must share the same forest with British Columbia's economic foundation - the forest industry. (P.R. Thompson, Sidney)

Crestbrook Forest Industries is concerned that commercial backcountry recreation may in fact create business opportunity at the expense of existing resource industry employment. (Crestbrook Forest Industries Ltd., Cranbrook)

If your "Commercial Backcountry Recreation Program" proposes to set aside yet again more areas to benefit a few commercial operators at the expense of the timber industry and other recreational uses then we cannot and will not support such a proposal. (Share the Rock Society, Queen Charlotte Islands)

Other individuals expressed the desire for some Crown land to be protected from all uses and preserved as pristine wilderness.

We strongly urge that wilderness areas should be set aside where no development takes place - especially no commercial development... (Kootenay Mountaineering Club, Castlegar)

You have missed one very important point, which is to ensure retention, in each region of our province, (of) a total wilderness reserve area which will have no development whatever, nor any consideration of commercial usage. (Paul Prodaniuk, Vernon)

Comments on Government Process and Jurisdiction

Many people stated that there are too many government agencies undertaking initiatives relating to the use of B.C.'s land and natural resources. A lead agency responsible for coordinating these diverse activities was often cited as being neccessary.

As there are several other ministries of government already influencing jurisdiction over wilderness areas, how can this all be coordinated and put into the proper perspective? ...a Commissioner of Crown lands could be appointed to adjudicate and administer wilderness land allocations within all ministries of government. (Kyllo Bros. Outfitting, Hudson's Hope)

...the various ministries of the B.C. government are working at odds with each other, all applying various policies which largely ignore the long term best interests of both the public and the tenure holder... We are confident that each of the ministries are all attempting to do the right thing in light of their individual mandates, but the result is constant compromise with no user being able to maximize their individual objectives, let alone establishing the best use of our Crown lands. (Sno-e Canada Ltd., Whistler)

The Ministry of Forests should have to share the responsibility of designation for backcountry and wilderness areas. It should not be the sole decision maker. Ministry of Tourism should have a total inventory, information on economic benefits and promotion of all locations. It should be a major influence in the decision making process. (Interior Alpine Recreation Ltd., Kamloops)

It seems to me that in most of these public discussions the same problems and questions are raised and it would therefore save everybody's time if all government departments could get together on issues that have the same underlying problems. (Evi Coulson, Telkwa)

Conclusion

BC Lands has received a large number of thoughtful comments with respect to the use and management of Crown land for commercial backcountry recreation. Most of the issues in the discussion paper produced wide-ranging debate, with good arguments often presented on all sides. Some submissions outlined alternative directions and policy options. A number of respondents gave detailed reviews of each proposal in the discussion paper. The time and effort that so many people contributed to the review of the proposed policies, and the interest shown in further contribution to this important policy initiative, is greatly appreciated by the ministry.

One of the main findings in the review of public comments is that there is no clear consensus on the direction government should take regarding the various issues raised in the discussion paper. Although there is no unanimous agreement on how government should resolve these matters, several broadly based concerns were evident in the public response. These are outlined below.

- The desire to retain unrestricted public access to Crown land was the overriding issue for the majority of respondents. Commercial backcountry recreation rights which would infringe on public use would be opposed by almost all the individuals and groups that responded to the discussion paper.

- Concern about the sale of Crown land was the second major issue brought out in the public responses. The sale of Crown land was often opposed by people who feared that large areas would be sold, or that even the sale of small sites could lead to the loss of public access. Environmental concerns and the need to settle Aboriginal land claims also caused some individuals to argue against selling Crown land.

- Foreign ownership of Crown land was another predominant concern. Many respondents expressed a great pride in British Columbia's natural heritage and wished to retain the ownership and management of this land in Canadian hands.

- Resource management, in general, was a concern for many people. Respondents questioned the ability of government to establish carrying capacity limits, resolve conflicts, monitor tenure holders, and enforce proper use of the land and resources. The perceived lack of commitment by government to land use planning was a serious concern for a number of people.

- The need for public input into decision making processes was strongly expressed. The ability to provide input at the policy development stage was appreciated by many respondents, and a number of people wanted further opportunities to be heard prior to finalizing policy. As well, public input into the evaluation of commercial backcountry recreation proposals was considered to be essential. Local residents felt they needed to be involved as they would be most affected by any such decisions. However, a number of individuals and groups outside the local area also expressed a desire to participate in proposal evaluations.

- The competitive process was the final area that received significant attention. The underlying theme in many submissions was a concern that "big dollars" would win in this process, and that existing operators, small businesses, public recreationists, and the environment would all lose as a result.

BC Lands is listening to these messages and will give serious consideration to all the comments received. These ideas and suggestions will be incorporated into the development of future policy. We would like to thank all those individuals and groups who have contributed to this process.

Comments regarding commercial backcountry recreation or this paper can be sent to the following address:

Ministry of Lands and Parks
Land Policy Branch
6th Floor
1802 Douglas Street
Victoria, British Columbia
V8V 1X4

Additional copies of this report, and the initial public discussion paper, are also available by writing to this address.